

Exhibit F

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

STACIE RAY, et al.

Plaintiffs,

v.

**STEPHANIE MCCLOUD, Director,
Ohio Department Health, et al.,**

Defendants.

Case No.: 2:18-cv-00272-MHW-CMV

Judge: Michael Watson
Magistrate Judge: Chelsey Vascura

DECLARATION OF PETER C. RENN

Pursuant to 28 U.S.C. 1746

I, Peter C. Renn, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am above the age of 18, I am competent to testify, and I have personal knowledge of the matters contained in this declaration.
2. I am Counsel with Lambda Legal Defense and Education Fund, Inc. (“Lambda Legal”), and I represent Plaintiffs in this litigation.
3. Lambda Legal is a nationwide non-profit organization that relies upon the contributions of its members and supporters, and in part upon attorney fees incurred in litigation, to fund its operations.
4. I graduated *magna cum laude* from Harvard Law School in 2006, where I was an executive editor of the Harvard Civil Rights-Civil Liberties Law Review. After law school, I clerked for the Honorable Lawrence Karlton in the United States District Court for the Eastern District of California. I have worked full-time on civil rights cases for the

LGBT community at Lambda Legal since 2010. I work in Lambda Legal's Western Regional Office, which is based in Los Angeles, California. I am a recipient of the National LGBT Bar Association's Best LGBT Lawyers Under 40 Award. Attached as Exhibit F-1 to this Declaration is a true and correct copy of my resume.

5. I am admitted to the State Bar of California; the Central, Eastern, and Northern Districts of California; the Fourth, Fifth, Ninth, D.C., and Federal Circuits; and the United States Supreme Court.
6. Before joining Lambda Legal, I practiced at the law firm of Munger, Tolles & Olson in Los Angeles, California. At the time I left the law firm in 2010, my billing rate was more than \$400 per hour. The current rates for an attorney with my years of experience in the Los Angeles market performing comparable complex civil litigation would be more than \$500 per hour.
7. During my time at Lambda Legal, I have acquired specialized experience and knowledge litigating cases involving discrimination against transgender people, including challenging the denial of identity documents that accurately reflect their gender identity. I heavily relied upon that experience and knowledge for my representation of Plaintiffs. Representative examples of the cases that I have litigated include the following: *F.V. v. Barron*, 286 F. Supp. 3d 1131 (D. Idaho 2018) (counsel in challenge to denial of birth certificates reflecting gender identity); *Karnoski v. Trump*, 926 F.3d 1180 (9th Cir. 2019) (counsel in challenge to ban on open military service by transgender people); *Rosati v. Igbinoso*, 791 F.3d 1037 (9th Cir. 2015) (counsel on appeal for transgender prisoner denied access to gender-affirming surgical care); *Fletcher v. Alaska*, 443 F. Supp. 3d 1024 (D. Alaska 2020) (counsel in denial of access to gender-affirming care); *Roberts v. Clark Cnty. Sch. Dist.*, 215 F. Supp. 3d 1001 (D. Nev. 2016) (*amicus* counsel in denial of restroom access for transgender employee under Title VII); *Carcaño v. McCrory*, 203 F.

Supp. 3d 615 (M.D.N.C. 2016) (counsel in challenge to North Carolina laws discriminating against transgender people in access to public facilities). I have also worked with experts regarding the importance of access to accurate identity documents for transgender people, which was relevant to the effective representation of Plaintiffs.

8. I am seeking fees for 52.1 hours of work on this case at a rate of \$375 per hour. Attached as Exhibit F-2 is a true and correct copy of the task-based itemized charges for my time in this case, which I have reviewed and approved. I exercised billing judgment to ensure that the time spent was reasonable and necessary under the circumstances.
9. The rate I am charging for my work on this case is comparable to rates for attorneys in this jurisdiction, a conclusion based in part on a review of the Ohio State Bar Association Report, attached as Exhibit A to the fee petition.
10. The lodestar figure for my work on this case, determined by multiplying my reasonable hours expended by my reasonable rate, is $52.1 \times 375 = \$19,537.50$.

Dated: February 1, 2021

By: /s/ Peter C. Renn
Peter C. Renn* (California Bar No. 247633)
Lambda Legal Defense and Education Fund
4221 Wilshire Blvd., Suite 280
Los Angeles, CA 90010
Phone: (213) 382-7600
Facsimile: (213) 351-6050
Email: prenn@lambdalegal.org

Attorney for Plaintiffs

**Admitted Pro Hac Vice*